



March 6, 2006

Director, Commodity Procurement Policy & Analysis Division
Farm Service Agency, US Department of Agriculture
Rm. 5755-S
1400 Independence Avenue, SW
Washington, DC 20250-0512

Re: Proposed Rule on Procurement of Commodities for Foreign Donation

Dear Sir or Madame:

These comments are submitted on behalf of the United States Dry Bean Council (USDBC) to the above referenced proposed rule published by the Commodity Credit Corporation (CCC) in the December 16, 2005 edition of the Federal Register (70 FR 74717-74721). USDBC represents all segments of the US dry bean industry, including growers, shippers, dealers, and canners of all classes of dry edible beans produced in the US. A significant tonnage of several classes of dry beans are procured and utilized annually by CCC in its export food aid programs. The purpose of these comments is to strongly support the change in procurement policy of commodities for foreign donation as outlined by CCC in the proposed rule.

Briefly, the CCC proposal would require firm, fixed freight availability and rates to be submitted to CCC for use in export food aid commodity purchase evaluations and subsequent freight bookings. We agree with CCC that adopting this proposal will streamline CCC's procurement process and allow for more efficient acquisition of food aid commodities. These increased efficiencies will result in overall cost saving to the food aid programs in the commodities that are delivered to overseas destinations. As such, budget savings that accrue from implementing the proposal can be used to procure and deliver more foodstuffs to meet program objectives. Such a result will be beneficial for the programs' hungry overseas recipients, as well as for US growers, processors, exporters, ports, stevedores, transportation entities, and all others involved in making our export food aid programs successful.

USDBC is pleased to support the proposed rule and appreciates the opportunity to submit these comments. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Byrum", written over the word "Sincerely,".

Jim Byrum, Chairman
USDBC Food Aid Committee

(email comments to Richard.Chavez@USDA.gov)
(fax comments to: (202) 690-2221)